

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

v.

**DON EUGENE SIEGELMAN,
PAUL MICHAEL HAMRICK,
GARY MACK ROBERTS, and
RICHARD M. SCRUSHY**

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CRIMINAL NO. 2:05-CR-119-MEF

**UNITED STATES' RESPONSE TO DEFENDANT HAMRICK'S
PROPOSED VOIR DIRE**

COMES NOW the United States of America, by and through Louis V. Franklin, Sr., Acting United States Attorney for the Middle District of Alabama, and Andrew C. Lourie, Acting Chief of the Public Integrity Section of the Criminal Division of the United States Department of Justice, and hereby files its Response to Defendant Paul Hamrick's Requested Voir Dire and says as follows:

1. The United States objects to question number 1 as irrelevant and unnecessarily invasive of the privacy of the jurors.
2. The United States objects to question numbers 2-6 as irrelevant.
3. The United States objects to question numbers 7-12 as irrelevant, improperly invasive of the privacy of the jurors, and having the potential to cause a given juror to fear for his or a family member's economic well being.
4. The United States objects to question numbers 13a and 14a as irrelevant, improperly invasive of the privacy of the jurors, and having the potential to cause a given juror to fear for his or a family member's economic well being.
5. The United States objects to question numbers 15-20 because they are argumentative, and have the tendency to place Defendant Hamrick's testimonial defense before the jury without giving

the government the opportunity to cross examine him. Further, these questions are incomplete and misleading assertions of law because they are without sufficient facts to permit an informed decision, and because they ask the jury to reach ultimate conclusions without having been properly instructed by the court and without having heard all the evidence. These questions, therefore, are therefore prejudicial to the right of the United States to a fair trial, unduly confusing and irrelevant.

Respectfully submitted this 10th day of April, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

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